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 Attorney for Plaintiff Julie Hanna

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

* * *

JULIE HANNA,

Plaintiff,

vs.

K-KEL, INC.. a Nevada Corporation; DOES I-
 X; ROE Business Entities I-X; Mark
 Broadhurst; Mike York; and Chase Swanson,
 Defendants.

Case No.: 2:21-cv-00639-JCM-BNW

Stipulation and Order to Extend Deadline for
 Response and Reply to Defendants Mark
 Broadhurst's and Chase Swanson's Motions to
 Dismiss (ECF No. 60 + 61)

[Second Request]

Pursuant to Local Rule 6-1, Defendant K-Kel, Inc. ("Defendant") and Plaintiff Julie Danou Hanna ("Plaintiff"), by and through their undersigned counsel, hereby stipulate to a fourteen (14) day extension of Plaintiff's deadline to file an Opposition to Defendants Mark Broadhurst's and Chase Swanson's Motions to Dismiss (ECF No. 60 + 61) and a twenty-one (21) day extension of Defendants' deadline to file a Reply to Plaintiff's Opposition, as follows:

	Old Deadline	New Deadline
Plaintiff's Opposition Deadline	April 4, 2022	April 18, 2022
Defendant's Reply Deadline	April 11, 2022	May 2, 2022

This is the second request for an extension of these deadlines. The requested extension is sought in good faith and not for purposes of undue delay.

GOOD CAUSE FOR EXTENSION OF DEADLINES

This extension is necessitated by the withdrawal of Plaintiff's counsel Kathryn Black from this matter. As Ms. Black was the lead attorney representing Plaintiff, her departure from Gilbert Employment Law P.C. will result in the reassignment of her case responsibilities, which include preparing Plaintiff's Oppositions to the Motions to Dismiss filed by Defendants Broadhurst and Swanson. A two-week extension would allow Plaintiff's counsel to reassign her responsibilities appropriately and with consideration for the heavy litigation schedule faced by the remainder of Plaintiff's counsel over the next few weeks.

Respectfully submitted,


DATED 3/30/2022

/s/ Gary Gilbert
 Gary M. Gilbert, Esq.
Pro Hac Vice
 Attorney for Plaintiff

/s/ Scott Mahoney
 Scott M. Mahoney, Esq.
 Nevada Bar No. 1099
 Attorney for Defendant

ORDER

IT IS SO ORDERED.


 UNITED STATES DISTRICT JUDGE

Dated: March 31, 2022.

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